

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA DIVISION

JEFFREY KENNEDY,)
Plaintiff,) No. 1:21-CV-0258-KAC-SKL
v.) JURY DEMAND
GARRY P. EMBERSON and,)
GEMSTAR TRANSPORT LLC,)
Defendants.)

**JOINT STIPULATION TO EXTEND TIME FOR DEFENDANTS
TO RESPOND TO DISCOVERY REQUESTS SERVED BY PLAINTIFF**

Come now the parties, by and through counsel, pursuant to Fed. R. Civ. P. 29, and hereby agree and stipulate that Defendants may respond to (1) Plaintiff's First Set of Interrogatories and Request for Production of Documents to Garry P. Emberson and (2) Plaintiff's First Set of Interrogatories and Request for Production of Documents to Gemstar Transport LLC within thirty (30) days after the Court enters an Order on Defendants' Motion for Judgment on the Pleadings as to Plaintiff's Claims of Direct Negligence (Doc. 15) currently pending with the Court.

The aforementioned discovery was served by Plaintiffs on January 12, 2022. The parties previously agreed to stipulate to an extension for Defendants to respond by March 11, 2022. Defendants subsequently filed the pending Motion for Judgment on the Pleadings (Doc. 15). The extended deadline under this Joint Stipulation shall not interfere with any deadlines set in the Court's Scheduling Order entered February 7, 2022 (Doc. 14).

Respectfully submitted this 3rd day of March 2022.

MCMAHAN LAW FIRM LOVELL LLP <u>/s/ R. Lew Belvin (by permission)</u> R. LEW BELVIN; BPR 028325 <i>Attorneys for Plaintiff</i> P.O. Box 11107 Chattanooga, TN 37401 Phone: (423) 265-1100 Fax: (423) 756-8120	COPELAND, STAIR, VALZ & LOVELL, LLP <u>/s/ G. Graham Thompson</u> ANGELA CIRINA KOPET, BPR 017921 G. GRAHAM THOMPSON, BPR 034467 735 Broad Street, Suite 1204 Chattanooga, TN 37402 Phone: (423) 713-7075 Fax: (423) 648-2283
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------